

# Exhibit 8

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*Class Counsel for Direct Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CAPACITORS ANTITRUST LITIGATION

Master File No. 3:14-cv-03264-JD

THIS DOCUMENT RELATES TO:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF DANIEL C. GIRARD  
IN SUPPORT OF CLASS COUNSELS'  
APPLICATION FOR ATTORNEYS' FEES  
AND REIMBURSEMENT  
OF EXPENSES SUBMITTED ON  
BEHALF OF GIRARD GIBBS LLP**

I, Daniel C. Girard, declare and state as follows:

1. I am a member of Girard Gibbs LLP ("the Firm"). I submit this Declaration in support of Class Counsel's interim application for attorneys' fees for services rendered to the class in the above-captioned litigation and for reimbursement of expenses reasonably incurred in the course of such representation. The time expended in preparing this Declaration is not included.

2. I have reviewed the Court's October 31, 2014 Order Appointing Interim Lead Class Counsel (Dkt. 319) ("Order"), including in particular the Order's provisions regarding fees, costs and expenses. The Firm has adhered to those provisions.

3. The Firm has acted as class counsel to Direct Purchaser Plaintiffs ("DPPs") in this class action. During the course of this litigation, the Firm has been involved in the following activities on behalf of the DPPs at the request and under the direction of Lead Counsel:

1           4.       The Firm has participated in overall case management and litigation strategy at the  
2 direction of Lead Counsel since early in the litigation, as detailed below.

3           5.       ***Complaint and Motions to Dismiss.*** Girard Gibbs conducted research, analysis, and  
4 investigative work, and made recommendations to Lead Counsel concerning the first amended  
5 complaint. The Firm also researched and drafted portions of DPPs' opposition to defendants' motions  
6 to dismiss the first amended complaint.

7           6.       ***Discovery.*** The Firm has participated in most aspects of discovery conducted on behalf  
8 of DPPs in this case. The Firm took an active role in the parties' Rule 26(f) conference and related  
9 meet and confer discussions, drafting the Rule 26(f) report and relevant ESI agreements, and  
10 negotiations concerning search terms. Girard Gibbs partner Dena Sharp has served on a small  
11 committee charged by Lead Counsel with overseeing the conduct and coordination of discovery on  
12 behalf of the DPPs. In that role, Ms. Sharp has participated in meet and confer discussions with  
13 counsel for nearly all defendants about ESI collection and production, requests for documents and  
14 responsive records, interrogatory responses and objections, and other discovery-related matters (global  
15 and defendant-specific); participated in discovery briefing and strategy decisions regarding related  
16 matters; and conducted analyses of defendants' privilege logs. In addition, the Firm has been  
17 responsible for conducting all aspects of discovery as to two defendant families, and related non-  
18 parties. Associates of the Firm have conducted extensive review and analysis of Japanese and English  
19 language documents, and have generated summaries of key documents, prepared deposition kits and  
20 assisted in the privilege review of DPPs' document productions.

21           7.       ***FTAIA.*** The Firm researched and advised Lead Counsel concerning the procedural  
22 implications of Defendants' motion for partial summary judgment seeking dismissal of claims under  
23 the Foreign Trade Antitrust Improvements Act (FTAIA), and took depositions of FTAIA declarants.

24           8.       ***Settlement.*** The Firm's senior partner Daniel Girard has participated in settlement  
25 negotiations with certain defendants, has strategized with Lead Counsel concerning settlement issues,  
26 and has provided input on settlement briefing filed with this Court.

27           9.       ***Summary of Time and Expenses.*** During the period from November 1, 2014 through  
28 September 30, 2016, the Firm performed 6,373.80 hours of work in connection with this litigation.

1 Based upon the historical hourly rates charged by the Firm and a \$385 per hour maximum for  
2 document review time, the lodestar value of the time is \$2,589,979.00. Attached hereto as Exhibit A is  
3 a chart which indicates the attorneys who worked on this litigation, the number of hours worked, the  
4 categories of their work and their respective lodestar values. Exhibit A was prepared from  
5 contemporaneous, daily time records regularly prepared and maintained by the Firm and which have  
6 been provided to Lead Counsel for review.

7 10. All of the services performed by the Firm in connection with this litigation were  
8 reasonably necessary in the prosecution of this case. There has been no unnecessary duplication of  
9 services for which the Firm now seeks compensation. The lodestar calculations exclude time spent  
10 reading or reviewing work prepared by others or other information relating to the case unless related to  
11 preparation for or work on a matter specifically assigned to the Firm by Lead Counsel. The rates at  
12 which the Firm seeks compensation are its usual and customary hourly rates charged for this work, and  
13 have recently been approved by courts in this District, including by the Honorable Lucy H. Koh in the  
14 *In Re Yahoo Mail Litigation*, No. 5:13-cv-05388-LHK and *In Re: High-Tech Employee Antitrust*  
15 *Litigation*, No. 11-CV-2509-LHK.

16 11. During the period from November 1, 2014 through September 30, 2016, the Firm  
17 incurred expenses in the sum of \$317,166.10. These expenses were reasonably and necessarily  
18 incurred in connection with this litigation and are summarized in the chart attached as Exhibit B.  
19 Expense documentation has been provided to Lead Counsel for review.

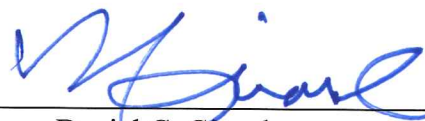
20 12. The expenses incurred are reflected on the books and records of the Firm. These books  
21 and records are prepared from checks and expense vouchers which are regularly kept and maintained  
22 by the Firm and accurately reflect the expenses incurred.

23 13. The Firm's compensation for the services rendered on behalf of the class is wholly  
24 contingent. Any fees and reimbursement of expenses will be limited to such amounts as approved by  
25 this Court.  
26  
27  
28

1 I hereby affirm under penalty of perjury of the laws of the United States that the foregoing is  
2 true and correct.

3  
4 Dated: January 27, 2017

By:



Daniel C. Girard

## EXHIBIT A

*In re: Capacitors Antitrust Litigation*

Case No. 3-14-cv-03264-JD

## GIRARD GIBBS LLP

TIME REPORT — November 1, 2014 to September 30, 2016

Name	Hours	Lodestar
<b>PARTNERS</b>		
Daniel C. Girard	107.50	\$ 91,754.00
Dena C. Sharp	683.50	\$ 401,550.50
<b>SENIOR COUNSEL</b>		
Jordan Elias	73.90	\$ 45,448.50
<b>ASSOCIATES</b>		
Scott M. Grzenczyk	235.50	\$ 93,268.50
Valerie H. Li	1,765.00	\$ 624,058.00
Linh H. Vuong	134.00	\$ 51,590.00
Emily H. Jenks	1,879.10	\$ 719,838.00
Walter B. Howe	173.40	\$ 66,759.00
Patrick S. Nagler	339.90	\$ 127,462.50
J. Mani Khamvongsa	982.00	\$ 368,250.00
<b>TOTAL LODESTAR</b>	<b>6,373.80</b>	<b>\$ 2,589,979.00</b>

## EXHIBIT B

In re: Capacitors Antitrust Litigation

Case No. 3-14-cv-03264-JD

GIRARD GIBBS LLP

EXPENSE REPORT — November 1, 2014 to September 30, 2016

Category	Amount
Assessments	\$ 300,000.00
Commercial Copies / Internal Copies	\$ 3,198.00
Court Fees/Filing Fees	
Computer Research	\$ 12,735.97
Postage	
Professional Fees	
Witness Fees	
Telephone 1	\$ 251.87
Travel	\$ 219.38
Other	\$ 760.88
<b>TOTAL</b>	<b>\$ 317,166.10</b>